

February 4, 2022

BY ECF – VIA FEDERAL DEFENDERS

The Honorable Jesse M. Furman
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

RE: *United States v. Michael Avenatti*, 19 CR 374 (JMF)

Dear Judge Furman:

I write to bring an urgent matter to the attention of the Court. Earlier this morning, Ms. Daniels gave an extensive interview to CNN (on TV and radio) regarding the jury's ongoing deliberations. During this interview, Ms. Daniels cast aspersions on the process of the jury's deliberations and stated they are showing prejudice against Ms. Daniels because of her beliefs in the paranormal. She also attacked the defendant and encouraged the jury to convict the defendant.

This is an outrageous development, especially in light of the current sensitive nature of the jury's deliberations and the developments during the last 24 hours, including the jury's notes. Ms. Daniels is the Government's chief witness, and both her and the Government had an obligation to ensure that she did not purposely undertaken efforts to interfere with defendant's right to a fair trial and due process. This obviously did not occur.

Accordingly, defendant moves for a mistrial. Defendant further requests that the Court make an immediate inquiry as to how this occurred, why it occurred, and the knowledge and involvement, if any, of the Government.

Respectfully Submitted,

/s/

Michael J. Avenatti
Defendant